

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

L. JOE PITTS, as Administrator of
the Estate of **SANDRA ANN**
SPENCER PITTS, Deceased,

PLAINTIFF,

VS.

BRIDGESTONE AMERICAS
HOLDINGS, INC.;
BRIDGESTONE FIRESTONE
NORTH AMERICAN TIRE, LLC;
and **BFS RETAIL AND**
COMMERCIAL OPERATIONS,
LLC, doing business as
FIRESTONE TIRE & SERVICE
CENTERS, jointly and severally,

DEFENDANTS.

CIVIL ACTION NUMBER:

2:06cv1008-ID-SRW

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a conference was held on February 9, 2007, and was attended by:

LANNY S. VINES
ROBERT P. BRUNER
Lanny Vines & Associates LLC
2142 Highland Avenue South
Birmingham, Alabama 35205-4002
*Attorney for Plaintiff L. Joe Pitts, as
Administrator of the Estate of Sandra Ann
Spencer Pitts.*

HOPE T. CANNON
Bradley Arant Rose & White LLP
1819 Fifth Avenue North
Birmingham, Alabama 35203
*Attorney for Defendants Bridgestone Americas
Holdings, Inc.;
Bridgestone Firestone North
American Tire, LLC, and BFS Retail and
Commercial Operations, LLC doing business
as Firestone Tire & Service Centers.*

2. Pre-Discovery Disclosures. The parties will exchange the information required by Fed. R.Civ. P. 26(a)(1) by **March 6, 2007**.

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: plaintiff's claims against defendants and defendants' defenses

Disclosure or discovery of electronically stored information should be handled as follows: the parties will produce paper copies of responsive, relevant and non-privileged documents, the originals of which were created or stored in electronic form to the extent such paper copies are available. The parties will also produce relevant, responsive and non-privileged video, photographic or audio information in the form in which they were created or stored (i.e., cassettes, audio or video discs, etc.), with the costs of such production to be borne by the requesting party.

All discovery commenced in time to be completed by **September 26, 2007**.

Maximum of **30** interrogatories by each party to any other party [Responses due **30** days after service.]

Maximum of **30** requests for admission by each party to any other party. [Responses due **30** days after service.]

Maximum of **13** depositions by plaintiff(s) and **13** by defendant(s) (excluding depositions of experts, which are not included in this limitation).

Each deposition limited to maximum of 8 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:

From plaintiff(s) by **July 3, 2007**. Plaintiff's experts to be deposed on or before August 3, 2007.

From defendants(s) by **August 14, 2007**. Defendant's experts to be deposed on or before September 14, 2007.

Supplementations under Rule 26(e) due within **30** days of learning of the need to supplement but in no event later than **30** days prior to the end of discovery.

4. The parties do not request a scheduling conference with the Court before entry of the scheduling order.

5. The parties request a pretrial conference in **October 2007**.

6. Parties should be allowed until **July 1, 2007**, to join additional parties and to amend the pleadings, or to July 15, 2007, to file any responsive pleading.

7. All potentially dispositive motions should be filed by **October 1, 2007**.

8. Settlement cannot be evaluated prior to some initial discovery.

9. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

From plaintiff(s): **45 days before trial;**
From defendant(s): **45 days before trial.**

10. Parties should have **14** days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

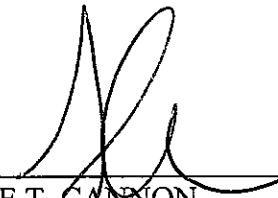
11. The case should be ready for trial by **November 2007**, which at this time is expected to take approximately one week.

Date: February 9, 2007



LANNY S. VINES
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